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BELLSOUTH TELECOMMUNICATIONS, INC.

REBUTTAL TESTIMONY OF RONALD M. PATE

BEFORE THE SOUTH CAROLINA PUBLIC SERVICE COMMISSION

DOCKET NO. 2001-65-C

JUNE 11, 2001



Q. PLEASE STATE YOUR NAME, YOUR POSITION WITH BELLSOUTH
TELECOMMUNICATIONS AND YOUR BUSINESS ADDRESS.

A. My name is Ronald M. Pate. I am employed by BellSouth
Telecommunications, Inc. ("BellSouth") as a Director, Interconnection
Services. In this position, I handle certain issues related to local
interconnection matters, primarily operations support systems ("OSS").
My business address is 675 West Peachtree Street, Atlanta, Georgia
30375.

Q. HAVE YOU PREVIOUSLY FILED TESTIMONY IN THIS DOCKET?

A. Yes. I filed direct testimony on February 16, 2001.

Q. WHAT IS THE PURPOSE OF YOUR TESTIMONY?

RETURN DATE: OK DBW
SERVICE: OK DBW

1 A. The purpose of my testimony is to rebut the testimony of Mr. Fassett on
2 behalf of New South Communications, NuVox Communications,
3 Broadslate Networks, ITC DeltaCom Communications, and KMC Telecom.
4 Specifically, my comments will respond to his Mr. Fassett's direct
5 testimony, pages 8 and 9, relating to the loop makeup service inquiry
6 ("LMUSI") and electronic loop makeup ("LMU").
7

8 Q. MR. FASSET, ON PAGE 8, LINES 14-17, STATES "A FORWARD-
9 LOOKING ANALYSIS SHOULD INSTEAD ASSUME THAT THE CLEC
10 HAS ACCESS TO THE ILEC'S ELECTRONIC OPERATIONS SUPPORT
11 SYSTEMS ("OSS") THAT INCLUDE THE NECESSARY DATA TO
12 QUALIFY ITS OWN LOOPS, ELIMINATING THE NEED FOR ANY
13 MANUAL LOOP MAKE-UP". DOES THE UNE REMAND REQUIRE
14 ELECTRONIC ACCESS TO BELL SOUTH'S OSS, THEREBY
15 ELIMINATING THE NEED FOR MANUAL LMU?
16

17 A. No. The FCC stated in its UNE Remand Order, ¶427: "We clarify that
18 pursuant to our existing rules, an incumbent LEC must provide the
19 requesting carrier with non-discriminatory access to the same detailed
20 information about the loop that is available to the incumbent". The FCC
21 further concluded in ¶431, "that access to loop qualification must be
22 provided to competitors within the same time intervals it is provided to the
23 incumbent LEC's own retail operations". Non-discriminatory access does
24 not imply nor require that detailed information about loops must be

1 available electronically and involve no manual processes. For BellSouth
2 to serve its own retail customers, BellSouth must perform manual service
3 inquiries for information when there is no electronic access for the
4 requested retail service /product. Therefore, the service inquiry process
5 for loop makeup information for CLECs is accomplished in substantially
6 the same time and manner as for services offered to BellSouth's retail
7 customers. Thus, these processes are in compliance with FCC rules and
8 orders.
9

10 Q. ON PAGE 8, LINES 17-20, MR. FASSETT IMPLIES THAT
11 BELL SOUTH'S ELECTRONIC DATABASE HAS NOT BEEN PROPERLY
12 MAINTAINED. WOULD YOU COMMENT?
13

14 A. I disagree with Mr. Fassett's implication. While 100% of BellSouth's loops
15 are populated in Loop Facilities Assignment and Control System
16 ("LFACS") with certain basic information, not all will have the detailed loop
17 makeup information. As a rule, BellSouth has populated detailed loop
18 makeup for its designed services that require special engineering and
19 provisioning and often are served by more than one central office or wire
20 center. BellSouth has not in the past populated LFACS with detailed loop
21 makeup information for non-designed services that require no special
22 provisioning and are served by one central office or wire center because it
23 did not need the detailed loop makeup information on these services. In
24 the highly populated metropolitan areas where the marketing efforts of

CLECs are most concentrated, however, it is estimated that a large percentage of loops with detailed loop makeup information are populated in LFACS. So it is only for that remaining small percentage of loops that the manual SI process may have to be utilized. And whenever CLECs must use the manual SI process for these remaining loops, BellSouth will load the resulting loop makeup information in LFACS for future queries.

Q. MR. FASSETT STATES, ON PAGE 9, LINES 6-7, " MANY UNNECESSARY, MANUAL PROCESSES REMAIN WHEN A CLEC ORDERS A LOOP WITH LOOP MAKEUP". PLEASE COMMENT.

A. Mr. Fasset's allegation that "many unnecessary manual processes remain" is unsupported in his testimony. BellSouth's electronic LMU requires minimal input to BellSouth's OSS by the CLEC and provides near real time LMU response. For example, a CLEC requesting a LMU for an existing facility, must only specify a type of facility involved (existing), provide the telephone number ("TN") or circuit identifier ("CKTID"), and the area where the TN or CKTID is located. A LMU response is provided in less than one minute, in most cases. The electronic process is fast and uncomplicated.

The manual LMUSI requires a minimum input by the requesting CLEC to obtain LMU information within a 3 business-day targeted response. The

1 CLEC provides a minimum amount of required information and certain
2 optional information based on the CLECs desired LMU response. On
3 working pairs, the end user's address and TN or CKTID is required
4 information while spare facilities LMUSI require only address information.
5 More specific information on electronic and manual LMU pre-order and
6 ordering process is available on BellSouth's Web Site:

7
8 <http://interconnection.bellsouth/guides/html/bpobr.html>
9

10 In my opinion, there are few, if any, unnecessary manual processes in the
11 LMU pre-ordering and ordering processes.
12

13 Q. MR. FASSETT, ON LINES 9-10, STATES "NO CLEC IN SOUTH
14 CAROLINA CAN OBTAIN LOOP MAKEUP ELECTRONICALLY IN
15 ADVANCE OF ORDERING A LOOP". DO YOU AGREE?
16

17 A. No, definitely not. As stated earlier, BellSouth released the electronic loop
18 makeup inquiry functionality to all CLECs on November 18, 2000. Thus,
19 contrary to Mr. Fasset's allegation, CLECs in South Carolina can, since
20 November 18, 2000, obtain LMU electronically in advance of ordering a
21 loop.
22

Q. MR. FASSETT, ON LINE 13, STATES "...CLEC'S TODAY MUST ORDER A LOOP WITH LOOP MAKEUP OR ELSE OBTAIN A SEPARATE MANUAL LOOP MAKEUP IN ADVANCE OF ORDERING THE LOOP. IT IS MY UNDERSTANDING THAT THIS PROCESS ADDS 5-7 BUSINESS DAYS TO THE FRONT END OF THE ORDERING PROCESS...". WOULD YOU COMMENT?

A. Mr. Fassett's reference to the LMU process intervals is not current for either BellSouth's electronic LMU or manual LMUSI functionalities. BellSouth's standard interval for electronic LMU requests is near real time. In December 2000, BellSouth began tracking the usage by CLECs of access to electronic LMU with the following results:

Month	Total queries for electronic LMU	% within 5 minutes
December 2000	1368	99.78%
January 2001	2572	99.92%
February 2001	4556	99.93%
March 2001	4841	100%

The standard interval for manual LMUSI requests is 3 business days. Therefore, Mr. Fassett's understanding of BellSouth's actual process performance and capabilities is not correct.

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Q. MR. FASSETT, ON LINE 17, STATES "...THE ONLY REAL CHOICE
FOR CLECS AT THIS TIME IS TO OBTAIN MANUAL LOOP MAKEUP
FROM BELLSOUTH." PLEASE COMMENT.

A. Mr. Fasset's statement is incorrect for previously stated reasons.
BellSouth is providing CLECs access to both electronic and manual LMU
in South Carolina and throughout it's region. This non-discriminatory
access is the same loop data that BellSouth provides itself through both
manual and electronic means.

Q. DOES THIS CONCLUDE YOUR TESTIMONY?

A. Yes.

STATE OF SOUTH CAROLINA)
) CERTIFICATE OF SERVICE
 COUNTY OF RICHLAND)

The undersigned, Susan Davis Gibson, hereby certifies that she is employed by the Legal Department for BellSouth Telecommunications, Inc. ("BellSouth") and that she has caused the Rebuttal Testimony of Ronald M. Pate to be served by placing such in the care and custody of the United States Postal Service, with first-class postage affixed thereto and addressed to the following this June 11, 2001:

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